

McGREGOR W. SCOTT
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IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA)	
)	CR. NO. S-99-433-WBS
Plaintiff,)	
)	
v.)	STIPULATION AND ORDER
JOHN THAT LUONG, et al.,)	
)	DATE: March 30, 2006
Defendant.)	TIME: 2:00 p.m.
)	CTRM: Honorable William B. Shubb

The United States of America, through its counsels of record, McGreggor W. Scott, United States Attorney for the Eastern District of California, and William S. Wong and Jason Hitt, Assistant United States Attorneys; defendant John That Luong, through his counsel, Richard Mazer, Esq.; defendant Son Van Nguyen, through his counsel, James R. Greiner, Esq.; defendant Thongsouk Lattanaphon, through his counsel, Jeffrey Staniels, Assistant Federal Defender; and defendant Hoang Ai Le, through his counsel, Joseph Wiseman, Esq.; stipulate and agree to the following revised motion schedule and exclusion of time under the Speedy Trial Act:

1. Government's response to defendants' motions to be filed on March 9, 2006;

2. Defendants' reply, if any, to be filed by March 23, 2006; and

3. Hearing on the motions March 30, 2006, at 2:00 p.m.

Counsel for the government needs additional time to research and prepare its responses to the defendants' motions. Counsel for the government is currently in trial and has been for the last few weeks in the case of United States v. Slater, et al., CR-S-03-0371 MCE. Accordingly, the parties stipulate that time be excluded for the pendency of these motions pursuant to 18 U.S.C. § 3161(h)(1)(F) - delay resulting from any pretrial motion and 18 U.S.C. § 3161(h)(8)(B)(ii) - additional time to adequately prepare for pretrial proceedings.

Respectfully submitted,

McGREGOR W. SCOTT
United States Attorney

DATED: February 6, 2006

By: /s/ William S. Wong
WILLIAM S. WONG
Assistant U.S. Attorney

DATED: February 6, 2006

By: /s/ Richard Mazer
RICHARD MAZER for defendant
John That Luong

DATED: February 7, 2006

By: /s/ James R. Greiner
JAMES R. GREINER for defendant
Son Van Nguyen

DATED: February 6, 2006

By: /s/ Jeffrey Staniels
JEFFREY STANIELS, AFD, for
defendant Thongsouk Lattanaphon

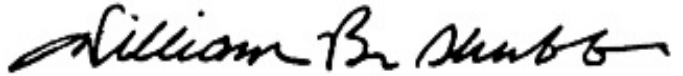
DATED: February 6, 2006

By: /s/ Joseph Wiseman
JOSEPH WISEMAN for defendant
Hoang Ai Le

ORDER

For the reasons set forth above, the revised law and motion schedule is adopted. Furthermore, time is excluded for the reasons set forth above.

DATED: February 7, 2006


WILLIAM B. SHUBB
UNITED STATES DISTRICT JUDGE